

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

BRAZOS ELECTRIC POWER
COOPERATIVE, INC.,

Debtor.¹

Chapter 11

Case No. 21-30725 (DRJ)

BRAZOS ELECTRIC POWER
COOPERATIVE, INC.,

Plaintiff,

Adv. Proc. No. 21-03863 (DRJ)

v.

ELECTRIC RELIABILITY COUNCIL OF
TEXAS, INC.

Defendant.

**BRAZOS ELECTRIC POWER COOPERATIVE, INC. AND THE OFFICIAL COMMITTEE
OF UNSECURED CREDITORS' SECOND AMENDED WITNESS AND EXHIBIT LIST FOR
TRIAL**

TO THE COURT, ALL PARTIES, AND THEIR COUNSEL OF RECORD:

Brazos Electric Power Cooperative, Inc. (“Brazos Electric” or “Debtor”) and the Official Committee of Unsecured Creditors (the “Committee”) of Brazos Electric, by and through their undersigned counsel, hereby jointly submit their Second Amended Witness and Exhibit List for Trial (the “Second Amended Witness and Exhibit List”) with respect to the above-captioned adversary proceeding (the “Adversary”).

¹ The Debtor in this chapter 11 case, along with the last four digits of its federal tax identification number is: Brazos Electric Power Cooperative, Inc. (4729). Additional information regarding this case may be obtained on the website of the Debtor’s claims and noticing agent at <http://cases.stretto.com/Brazos>. The Debtor’s address is 7616 Bagby Avenue, Waco, TX 76712.

DEBTOR AND THE COMMITTEE'S WITNESSES

A. Expect to Present Witnesses

Debtor and the Committee expect to present the following witnesses at trial:

1. **Clifton Karnei**, Brazos Electric (as a fact witness);
2. **Khaki Bordovsky**, Brazos Electric (as a fact witness);
3. **Dan Kueker**, Brazos Electric (as a fact witness);
4. **Kenan Ögelman**, ERCOT (as a fact witness);
5. **Bill Magness**, ERCOT (as a fact witness);
6. **Dave Maggio**, ERCOT (as a fact witness);
7. **Woody Rickerson**, ERCOT (as a fact witness);
8. **Matthew Tanner**, Ph.D., Berkeley Research Group, LLC (as an expert);
9. **Shams Siddiqi**, Ph.D., Crescent Power, Inc. (as an expert);
10. **Christopher Kearns**, Berkeley Research Group (as an expert);
11. **Howard Scott**, Ph.D., Cognyst Advisors (as an expert);
12. **DeAnn Walker**, formerly PUCT (as a fact witness);
13. **Arthur D'Andrea**, formerly PUCT (as a fact witness); and
14. **Carrie Bivens**, ERCOT Independent Market Monitor, Potomac Economics (as a fact witness and expert by deposition testimony).

B. May Call Witnesses

Debtor and the Committee may call as witnesses at trial:

15. **Joshua Clevenger**, Brazos Electric (as a fact witness);
16. **Dean Thrall**, Brazos Electric (as a fact witness by deposition testimony or in-person);
17. **Joe Booth**, Brazos Electric (as a fact witness by deposition testimony or in-person);

18. **Johnny York**, Brazos Electric (as a fact witness by deposition testimony or in-person);
19. **Mark Ruane**, ERCOT (as a fact witness);
20. **Brad Jones**, ERCOT (as a fact witness);
21. **Dan Woodfin**, ERCOT (as a fact witness by deposition testimony);
22. **Gary Franzen**, ACES (as a fact witness by deposition testimony);
23. **Christian Nagle**, ACES (as a fact witness);
24. **Rodney Kuhl**, ACES (as a fact witness by deposition testimony);
25. **Danielle Powers**, Concentric Energy Advisors, Inc. (as an expert);
26. Any witness identified, offered, or call by any other party;
27. Any witness necessary to lay the foundation for the admission of exhibits; and
28. Any rebuttal and/or impeachment witnesses as necessary.

DEBTOR AND THE COMMITTEE'S EXHIBITS

Debtor and the Committee may offer into evidence any one or more of the exhibits included within Exhibit A hereto.

RESERVATION OF RIGHTS

The Second Amended Witness and Exhibit List is subject to all stipulations within the *Stipulation Regarding Rule 26(a)(3) Pretrial Disclosures and Trial Witnesses* filed on behalf of all parties to this Adversary on February 2, 2022 [Adv. Dkt. No. 365], the *Joint Stipulation Regarding Objections to Trial Exhibits* filed on behalf of all parties to this Adversary on February 6, 2022 [Adv. Dkt. No. 374], and the *Joint Stipulation to Limit Expert Testimony at Trial* filed on behalf of certain parties to this Adversary on February 9, 2022 [Adv. Dkt. No. 385] (collectively, the "Pretrial Stipulations"). To the extent the witnesses, testimony by deposition designations, and documents or other exhibits listed by Debtor and the Committee

impinge on subject matters involving hedging or winterization, these disclosures are made out of an abundance of caution, subject to all Pretrial Stipulations and reservations within *Debtor and the Committee's Objections to ERCOT and Defendant Intervenors' Pre-Trial Disclosures* [Adv. Dkt. 381], and without admitting and/or waiving any rights to challenge the relevance of such issues to the Adversary.

Debtor and the Committee reserve the right to modify, amend or supplement the Second Amended Witness and Exhibit List at any time prior to the conclusion of the trial. Debtor and the Committee reserve the right to call or to introduce one or more, or none, of the witnesses listed above. Debtor and the Committee reserve the right to cross-examine any witness called by any other party. Debtor and the Committee reserve the right to ask the Court to take judicial notice of pleadings, transcripts and/or documents filed in or in connection with this Adversary or other relevant proceedings. Debtor and the Committee reserve the right to object to exhibits listed on any party's exhibit list (including newly produced or listed documents) for any purpose at any time prior to the conclusion of the trial. Designation of any exhibit below does not waive any objections the Debtor and the Committee may have to any exhibit listed on any other party's exhibit list.

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Dated: February 18, 2022
Houston, Texas

Respectfully submitted,

EVERSHEDS SUTHERLAND (US) LLP

By: /s/ Lino Mendiola

Lino Mendiola (SBT 00791248)
Michael Boldt (SBT 24064918)
David Baay (SBT 24027050)
Jim Silliman (SBT 24081416)
One American Center
600 Congress Ave., Suite 2000
Austin, TX 78701
Telephone: (512) 721-2700
Facsimile: (512) 721-2656
Email: linomendiola@eversheds-sutherland.us
Email: michaelboldt@eversheds-sutherland.us
Email: davidbaay@eversheds-sutherland.us
Email: jimsilliman@eversheds-sutherland.us

Special Counsel for the Debtor and Debtor in Possession

O'MELVENY & MYERS LLP

Louis R. Strubeck, Jr. (SBT 19425600)
Nick Hendrix (SBT 24087708)
2501 North Harwood Street
Dallas, Texas 75201
lstrubeck@omm.com
nhendrix@omm.com
(972) 360-1925

Co-Counsel for the Debtor and Debtor in Possession

NORTON ROSE FULBRIGHT US LLP

By: /s/ Paul Trahan

Jason L. Boland (SBT 24040542)
Julie G. Harrison (SBT 24092434)
Maria Mokrzycka (SBT 24119994)
1301 McKinney Street, Suite 5100
Houston, TX 77010
Telephone: (713) 651-5151
Facsimile: (713) 651-5246
Email: jason.boland@nortonrosefulbright.com
Email: julie.harrison@nortonrosefulbright.com
Email: maria.mokrzycka@nortonrosefulbright.com

Paul Trahan (SBT 24003075)
98 San Jacinto Boulevard, Suite 1100
Austin, TX 78701
Telephone: (512) 536 5288
Facsimile: (512) 536 4598
Email: paul.trahan@nortonrosefulbright.com

Steve A. Peirce (SBT 15731200)
111 West Houston Street, Suite 1800
San Antonio, TX 78205
Telephone: (210) 270-7179
Facsimile: (210) 270-7205
Email: steve.peirce@nortonrosefulbright.com

Counsel for the Debtor and Debtor in Possession

PORTER HEDGES LLP

/s/ John F. Higgins

John F. Higgins (TX 09597500)
Eric D. Wade (TX 00794802)
Heather K. Hatfield (TX 24050730)
M. Shane Johnson (TX 24083263)
Megan Young-John (TX 24088700)
PORTER HEDGES LLP
1000 Main Street, 36th Floor
Houston, Texas 77002
Telephone: (713) 226-6000
Facsimile: (713) 228-1331
jhiggins@porterhedges.com
ewade@porterhedges.com
hhatfield@porterhedges.com
sjohnson@porterhedges.com
myoung-john@porterhedges.com

***Counsel to the Official Committee of
Unsecured Creditors***

**KRAMER LEVIN NAFTALIS & FRANKEL
LLP**

/s/ Thomas Moers Mayer

Thomas Moers Mayer (admitted *pro hac vice*)
Amy Caton (admitted *pro hac vice*)
Jennifer Sharret (admitted *pro hac vice*)
John P. Coffey (admitted *pro hac vice*)
Ronald S. Greenberg (admitted *pro hac vice*)
Jeffrey S. Trachtman (admitted *pro hac vice*)
Seth F. Schinfeld (admitted *pro hac vice*)
1177 Avenue of the Americas
New York, New York 10036
(212) 715-9100
(212) 715-8000
tmayer@kramerlevin.com
acaton@kramerlevin.com
jsharret@kramerlevin.com
jcoffey@kramerlevin.com
rgreenberg@kramerlevin.com
jtrachtman@kramerlevin.com
sschinfeld@kramerlevin.com

***Counsel to the Official Committee of
Unsecured Creditors***

CERTIFICATE OF SERVICE

I certify that on February 18, 2022, I caused a copy of the foregoing document to be served via the Court's CM/ECF system on all counsel of record in the Adversary.

/s/ Maria Mokrzycka
Maria Mokrzycka

Exhibit A
Trial Exhibits for Debtor and the Committee

Exh. No.	Date	Bates	Depo. Exh.	Description of Document Debtor and the Committee Expect to Offer	Conf. (C) or Highly Conf. (HC)	Offered	Objection	Admitted/ Not Admitted	Disposition
PX001	6/1/2010	BRAZOS_DR_000001752 - BRAZOS_DR_000001958		Indenture of Deed of Trust, Security Agreement, and Financing Statement dated as of June 1, 2010	C				
PX002	4/1/2015	BRAZOS_000220487		Standard Form Market Participant Agreement between Brazos and ERCOT	C				
PX003	9/28/2018	BRAZOS_DR_000005279 - BRAZOS_DR_000005418		Second Amended and Restated Credit Agreement between Brazos Electric Power Cooperative, Inc. and Bank of America, N.A. dated as of September 28, 2018	C				
PX004	3/25/2019	BRAZOS_DR_000003229		2018 BEPC Auditors Report and Consolidated Financial Statements	C				
PX005	3/3/2020	BRAZOS_000094559	Clevenger 125/ Kuhl 1	ACES Memo re: 2020.03 Brazos Unhedged Bidding Strategy	C				
PX006	3/18/2020	BRAZOS_DR_000003129		2019 BEPC Financial Statement and Auditors Report	C				
PX007	1/26/2021	BRAZOS_DR_000005248 - BRAZOS_DR_000005253		S&P Global Ratings, "Brazos Electric Power Cooperative Inc., Brazos Sandy Creek Electric Cooperative Inc.; Rural Electric Coop", dated January 26, 2021	C				
PX008	Feb-21			Brazos Electric's ERCOT Final February 2021 Settlement Summary for DAM CRR	C				
PX009	Feb-21			Brazos Electric's ERCOT Final February 2021 Settlement Summary for DAM QSE	C				
PX010	Feb-21			Brazos Electric's ERCOT Final February 2021 Settlement Summary for RT QSE	C				

PX011	Feb-21			ERCOT Peaker Net Margin Reports for February 12, 2021 through February 21, 2021	C				
PX012	2/3/2021	BRAZOS_000 077509		ACES email to D. Kueker RE: Position + Market Update 2-3-2021 PM	C				
PX013	2/3/2021	BRAZOS_000 077111		Attachment to Position + Market Update 2-3-2021 AM	C				
PX014	2/3/2021	BRAZOS_000 077230		Capacity Position Spreadsheet	C				
PX015	2/3/2021	BRAZOS_000 077231		Capacity Position Spreadsheet	C				
PX016	2/3/2021	BRAZOS_000 077217		RE: Position + Market Update 2-3-2021 AM	C				
PX017	2/5/2021	BRAZOS_000 078513		ACES email from D. Kueker RE: Gas Supply Next Week	C				
PX018	2/5/2021	BRAZOS_000 242890	Kueker Ex. 12	Internal Brazos Email RE: Fuel oil inventory for Miller units	C				
PX019	2/5/2021	BRAZOS_000 243760	Kueker Ex. 5	Internal Brazos Email RE: Johnson Co. Fuel Oil Capacity?	C				
PX020	2/8/2021	ERCOT_B026 88873– ERCOT_B026 88878	Magness 11	Text Messages with DeAnn Walker between 02/08/2021 and 03/08/2021	C				
PX021	2/10/2021	BRAZOS_000 080552		ACES email from R. Vrabel FW: Power Plants Restrictions in Atmos North Texas Area	C				
PX022	2/10/2021	BRAZOS_000 080356		ACES email to D. Kueker Re: ETF IT	C				
PX023	2/10/2021	BRAZOS_000 139751		Internal Brazos Emails RE: Fuel Oil Specs for Brazos Electric Miller & Johnson	C				
PX024	2/10/2021	BRAZOS_000 210368	Kueker Ex. 16	Internal Brazos Emails Re:Fuel Oil Recommendation for Millers 4/5	C				
PX025	2/10/2021	BRAZOS_000 008375 - 8406		Winter Storm 2021 Jack Checklist	C				
PX026	2/11/2021	BRAZOS_000 097140		Email from Stebbins to York re OSI Rolling Outage Program – Sub List – Feb 2021.xlsx	C				
PX027	2/11/2021	BRAZOS_000		Internal Brazos Emails RE: follow up on fuel	C				

		100232		purchases for Brazos Electric					
PX028	2/11/2021	BRAZOS_000 157464		Internal Brazos Emails RE: Fuel Oil Recommendation for Millers 4/5	C				
PX029	2/11/2021	ERCOT_B015 1503– ERCOT_B015 1545	Magness 18/ Magness 100 / Walker 121	Magness Contemporaneous Notes, 2/11/2021 – 3/27/2021	C				
PX030	2/11/2021	BRAZOS_000 097141		OSI Rolling Outage Program – Sub List – Feb 2021.xlsx (attachment to BRAZOS_000097140)	C				
PX031	2/12/2021	BRAZOS_000 081539		ACES email from D. Kueker Re: Miller ETF gas for weekend strip	C				
PX032	2/12/2021	BRAZOS_000 081738		ACES email from J. Clevenger Re: Jack Gas Update for weekend	C				
PX033	2/13/2021	BRAZOS_000 159257		Internal Brazos Emails Re: Script for PUCT appeal on support to deliver fuel oil to Miller and Johnson Plants	C				
PX034	2/14/2021	BRAZOS_000 083174		ACES email from D. Kueker Re: Miller 2+3 HSLs	C				
PX035	2/15/2021	BRAZOS_000 260401	Kueker Ex. 43	Messages between D. Kueker and D. Thrall	C				
PX036	2/16/2021	BRAZOS_000 083664		ACES and Brazos email re: Fuel Inventory Update- Tuesday 06:00	C				
PX037	2/16/2021	BRAZOS_000 160952	Kueker Ex. 35	Internal Brazos Emails Re: ETF Gas – flowing to Jack instead of Miller as of 1300 Tue	C				
PX038				EXHIBIT INTENTIONALLY OMITTED					
PX039	2/17/2021	BRAZOS_000 260409	Kueker Ex. 36	Messages between D. Kueker and R. Vrabell	C				
PX040	2/18/2021	BRAZOS_000 084862		ACES email from D. Kueker FW: Worsham- Steed OFO	C				
PX041	2/18/2021	BRAZOS_000 084863		Worsham-Steed Gas Storage LLC, Operational Flow Order	C				

PX042	2/19/2021	BRAZOS_000 163884	Kueker Ex. 37	Internal Brazos Emails Re: Gas Update as of Friday 0928	C				
PX043	2/22/2021	BRAZOS_000 165742		Internal Brazos Emails FW: Notice of Force Majeure - ETC Marketing, Ltd.	C				
PX044	2/22/2021	BRAZOS_000 219552		Notice of Force Majeure - 2021 - TGPNA - Brazos FM Feb Freeze.pdf	C				
PX045	2/25/2021	BRAZOS_000 207307 - BRAZOS_000 207309		Brazos Electric's Force Majeure Notice to ERCOT, dated February 25, 2021	C				
PX046	2/28/2021			ERCOT Load Shed Event Log for February 2021	C				
PX047	3/1/2021	BRAZOS_000 208786 – 208829		ERCOT ISO Operations Support Request for Information	C				
PX048	3/3/2021	BRAZOS_000 008310 – 8350		Brazos QSE Response to ERCOT RFI	C				
PX049	3/29/2021	BRAZOS_000 008284		FERC_RFII_1a_Generator_Outage.xlsx	C				
PX050	3/30/2021	BRAZOS_000 236908		Brazos Trade Data - Trade Data (NG - Feb) - BRAZOS022821(bal to NG).xls	C				
PX051	9/28/2021			S&P Capital IQ, Day-Ahead Natural Gas Prices, Gulf Coast – TX Region	C				
PX052	Feb. 2020 and Feb. 2021			ERCOT RTSPP data for HB_HBAVG for February 1-28, 2021 and February 15-19, 2020	C				
PX053		BRAZOS_000 100072		ERCOT issues Watch for extreme cold weather	C				
PX054				ERCOT provided workpapers ERCOT_B0132965.xlsx and ERCOT_B0132967.CSV	C				
PX055	3/25/2020	BRAZOS_000 270719		BP 317 Energy Risk Management	HC				
PX056	2/4/2021	BRAZOS_000 095471		ACES Email Re: Position + Market Update 2- 4-2021 AM	HC				
PX057	2/4/2021	BRAZOS_000		Capacity Position Spreadsheet	HC				

		095480							
PX058	2/5/2021	BRAZOS_000 090309		Brazos Electric Cooperative, February 2021 Power Cost Estimate, February 4, 2021	HC				
PX059	2/8/2021	ERCOT_B026 7059- ERCOT_B026 7132	Walker 111	Text messages between Lindsay Hughes and Bill Magness between the dates 02/08/2021 and 03/08/2021	HC				
PX060	2/11/2021	ERCOT_B015 9864 – 159868		Email string re Power Plants Restrictions in Atmos North Texas Area	HC				
PX061	2/11/2021	ERCOT_B026 9888- ERCOT_B026 9893	Rickerson 10	Text Message between Woody Rickerson, Dan Woodfin and Jimmy Hartman between dates of 02/11/2021 and 02/22/2021	HC				
PX062	2/12/2021	BRAZOS_000 158698		ACES emails with J. Clevenger RE: Setup for Sun (2/14)	HC				
PX063	2/12/2021	BRAZOS_000 090542		Email between Brazos and UCS RE: United Position for Feb. 12-13	HC				
PX064	2/12/2021	BRAZOS_000 214875		February 2021 Power Cost Estimate	HC				
PX065	2/13/2021	ERCOT_B016 3827	Ögelman 38	Email(s) re: Golden Spread Units	HC				
PX066	2/13/2021	ERCOT_B016 3340- ERCOT_B016 3341	Rickerson 5	Email(s) re: Load shed amounts	HC				
PX067	2/15/2021	ERCOT_B016 9418	Bivens 5	Email from Carrie Bivens RE: Pricing during EEA	HC				
PX068	2/15/2021	ERCOT_B016 9894– ERCOT_B016 9896	Maggio 106	Email(s) re: ERCOT SCED RTSP pricing during EEA load shed	HC				
PX069	2/15/2021	ERCOT_B016 8446– ERCOT_B016 8447	Maggio 104/ Ögelman 41	Email(s) re: Pricing info for media call	HC				

PX070	2/15/2021	ERCOT_B028 5866– ERCOT_B028 5867	Maggio 105 / Ögelman 39	Email(s) re: Talking points regarding prices below 9000 during firm load shed	HC				
PX071	2/15/2021	ERCOT_B016 9429– ERCOT_B016 9430	Maggio 2/ Maggio 107	Email(s) re: Why aren't prices at \$9,000	HC				
PX072	2/16/2021	ERCOT_B017 2492-93		Email chain re: Notice of price correction for PUCT emergency order	HC				
PX073	2/16/2021	ERCOT_B027 8955	Graves 13/ Ögelman 42	Email(s) re: ERCOT SCED RTSPP pricing during EEA load shed	HC				
PX074	2/16/2021	ERCOT_B017 4173– ERCOT_B017 4178	Maggio 115	Email(s) re: RTRDPA	HC				
PX075	2/16/2021	ERCOT_B017 2254	Ögelman 34	Email(s) re: suspending defaults	HC				
PX076	2/17/2021	ERCOT_B017 5560– ERCOT_B017 5562	Ögelman 45	Email(s) re: ERCOT morning brief	HC				
PX077	2/17/2021	ERCOT_B028 6554– ERCOT_B028 6555	Maggio 116	Email(s) re: GTBD adjustment for pricing run as we exit EEA3	HC				
PX078	2/17/2021	ERCOT_B017 5672– ERCOT_B017 5677	Ögelman 46	Email(s) re: Market update for 2/16	HC				
PX079	2/18/2021	PUCT 0033399	Ruane 11	Email between PUCT and Potomac Economics re: collateral request	HC				
PX080	2/18/2021	BRAZOS_000 089495		Power Cost Estimate Template Feb 2021 as of 2-18-21.xlsx	HC				

PX081	2/22/2021	ERCOT_B001 6391- ERCOT_B001 6393	Maggio 103	Email(s) re: Lt. Governor Question	HC				
PX082	2/22/2021	BRAZOS_000 214034		Internal Brazos Emails Re: TGPNA Force Majeure - Brazos Electric Power Cooperative	HC				
PX083	3/4/2021	PUCT 0206428- PUCT 0206430	D'Andrea 21	Email from Connie Corona re: IMM Letter with energy price recommendation	Redacted and de-designated				
PX084	3/8/2021	BRAZOS_000 187097		Hedge Amounts and Power Purchases_Final - 0221 Brazos SalesandPurchases Report as of 030821 - Final.xlsx	HC				
PX085	3/31/2021	ERCOT_B001 0255	Frosch 13	Email from Colleen Frosch re: 0091 ERCOT ISO Responses to FERC Attachment A	HC				
PX086	3/31/2021	ERCOT_B006 6186- ERCOT_B006 6187; ERCOT_B006 6223- ERCOT_B006 6228; ERCOT_B006 6254- ERCOT_B006 6265	Frosch 14	Narrative answers as attachments to FERC Attachment A	HC				
PX087	4/9/2021	ERCOT_B006 7116	Frosch 17	ERCOT ISO Response to FERC Attachment A Data Request March 17, 2021	HC				
PX088	6/25/2021	BRAZOS_000 274542 - BRAZOS_000 274580		Brazos Electric Power Cooperative, Inc. and Subsidiaries Independent Auditor's Report and Consolidated Financial Statements for the year ended December 31, 2020	HC				
PX089				Clevenger_compiled_documents	HC				

PX090				Exhibit A to Debtor's Objections and Answers to ERCOT's Second Set of Interrogatories	HC				
PX091		BRAZOS_000 091157 – 91163		Timeline of ERCOT notices and weather advisories	HC				
PX092	12/21/1989	Public - https://www.nerc.com/pa/rrm/ea/February%202011%20Southwest%20Cold%20Weather%20Event/ERCOT%20Emergency%20Operation%201989.pdf		ERCOT Emergency Operation 1989					
PX093	6/1/2012		Graves 6	2012 Brattle ERCOT Resource Adequacy Review					
PX094	Jul-12	public - https://www.puc.texas.gov/industry/electric/reports/ERCOT_annual_reports/2011annualreport.pdf		ERCOT 2011 State of the Market					
PX095	9/12/2013			Transcript of September 12, 2013, PUCT Open Meeting; Nodal Protocol Revision Request 568					
PX096	9/19/2013			Nodal Protocol Revision Request No. 568 – Real-Time Reserve Price Adder Based on Operating Reserve Demand Curve					
PX097				EXHIBIT INTENTIONALLY OMITTED					
PX098	8/12/2014		Ögelman 23	NPRR626 - Reliability Deployment Price Adder (formerly "ORDC Price Reversal					

				Mitigation Enhancements”), ERCOT Board Report, August 12, 2014					
PX099	Jul-15	Public - https://www.puc.texas.gov/industry/electric/reports/ERCOT_annual_reports/2014annualreport.pdf		ERCOT 2014 State of the Market					
PX100	11/1/2018		Magness Expert 10	ERCOT Nodal Protocols, Section 22, Attachment A: Standard Form Market Participant Agreement, November 1, 2018					
PX101	3/1/2019		Ögelman 4	ERCOT Market Update: ERCOT’s use of Energy Emergency Alerts					
PX102	5/9/2019	Public - https://interchange.puc.texas.gov/Documents/48721_25_1017465.PDF	Magness Expert 5	Order Adopting Amendment to Sec. 25.505 and Repeal of Sec. 25.508 as Approved at the May 9, 2019 Open Meeting					
PX103	Jun-19	Public - https://www.puc.texas.gov/industry/electric/reports/ERCOT_annual_reports/2018annualreport.pdf		ERCOT 2018 State of the Market					
PX104	6/6/2019	Public - https://www.ercot.com/files/docs/2019/06/06/ERCOT_Energy_Emergency_Alert_Communications_Matrix_June_2019.pdf		ERCOT Energy Emergency Alert Communications Matrix June 2019					

		nications_Matrix_June_2019.pdf							
PX105	7/30/2019	BRAZOS_000260253		Certified Copy of Resolution Approving Revision No. 15 Wholesale Power Supply and Delivery Service Rate and the TRRM Protocols					
PX106	2/3/2020	ERCOT_B0134694-ERCOT_B0134696	Ögelman 2	ERCOT Employee Organizational Chart					
PX107	5/29/2020			Methodology for Implementing Operating Reserve Demand Curve (ORDC) to Calculate Real-Time Reserve Price Adder, Version 2.5					
PX108	6/18/2020	Public - fitchratings.com/research/us-public-finance/fitch-affirms-brazos-electric-power-cooperative-inc-tx-idr-at-a-outlook-positive-18-06-2020		Fitch Ratings, Rating Action Commentary "Fitch Affirms Brazos Electric Power Cooperative, Inc. TX IDR at 'A+' – Outlook Positive", dated June 18, 2020					
PX109	7/1/2020		Ögelman 25/ Sotkiewicz 26	ERCOT Methodology for Implementing Operating Reserve Demand Curve (ORDC) to Calculate Real-Time Reserve Price Adder, Version 2.6					
PX110	9/23/2020	BRAZOS_000074113		Brazos 2020-2023 Natural Gas Supply Plan September 2020					

PX111	Oct-20	Public - https://www.ercot.com/files/docs/2021/04/09/2020_10_Settlement_Energy_and_PTP_Obligations.pdf		ERCOT, Settlement: Energy and PTP Obligations, PowerPoint presentation					
PX112	11/5/2020	Public - https://www.ercot.com/files/docs/2020/11/05/SARA-FinalWinter2020-2021.pdf		Final Seasonal Assessment of Resource Adequacy for the ERCOT Region (SARA) Winter 2020/2021					
PX113	11/5/2020	Public - https://www.ercot.com/files/docs/2020/11/05/SARA-FinalWinter2020-2021.xlsx		Final Seasonal Assessment of Resource Adequacy for the ERCOT Region (SARA) Winter 2020/2021 (Excel native)					
PX114	11/23/2020			CDR Summer Peak Ave Wind Capacity Percentages 11-23-2020 (excel)					
PX115	Dec-20	Public - https://www.ercot.com/files/docs/2020/12/23/2020_LTSA_Report.zip		2020 Long-Term System Assessment for the ERCOT Region					
PX116	1/1/2021		Ögelman 5	ERCOT Nodal Excerpts					
PX117	1/1/2021		Payton 5	ERCOT Nodal Protocols Section 1: Overview					
PX118	1/1/2021		Payton 7	ERCOT Nodal Protocols Section 21: Revision Request Process					
PX119	1/1/2021		Sotkiewic	ERCOT Nodal Protocols Section 6:					

			z 4	Adjustment Period and Real-Time Operations					
PX120	1/1/2021		Graves 18	Protocol 6.5.9.4.2 EEA Levels					
PX121	1/11/2021	Public - https://www2.ilinois.gov/sites/ipa/Documents/2021%20Electricity%20Plan/Final%20Docs/IPA%202021%20Electricity%20Procurement%20Plan%20%289-28-2020%29.pdf		IPA 2021 Electricity Procurement Plan (Final 11 January 2021)					
PX122	1/15/2021	Public - https://www.ercot.com/files/docs/2021/01/15/2020_ERCOT_Reserve_Margin_Study_Report_FINAL_1-15-2021.pdf		Estimation of the Market Equilibrium and Economically Optimal Reserve Margins for the ERCOT Region for 2024					
PX123	Feb-21			Brazos Electric QSE ERCOT Settlement Invoices, dated February 1, 2021 to February 28, 2021					
PX124	Feb-21			Brazos Electric Temporary Affordability Adjustments Applied to Member Invoices, February 2021					
PX125	Feb-21			Brazos Electric's Balance Sheet Trial Balance, February 2021					
PX126	Feb-21			ERCOT 60 Day SCED Disclosure Reports for February 15, 2021 through February 19, 2021					

PX127	Feb-21			ERCOT director-level org chart as of February 2021 [attached to 8/3/2021 J. Alibhai email]					
PX128	2/1/2021	Public - https://www.ercot.com/files/docs/2021/08/18/February_1__2021_Nodal_Protocols.pdf		ERCOT Nodal Protocols as of February 1, 2021					
PX129	Feb-21	Public - https://www.vibrantcleanenergy.com/wp-content/uploads/2021/03/VCE-ERCOT-StormUri.pdf		ERCOT Winter Storm Uri Blackout Analysis (February, 2021) Vibrant Clean Energy					
PX130	Feb-21			Historical Real-Time ORDC and Reliability Deployment Price Adders and Reserves					
PX131	Feb-21			Historical Real-Time ORDC and Reliability Deployment Prices for 15-Minute Settlement Interval					
PX132	Feb-21		Magness Expert 6	Protocol 4.4.11 (Feb. 2021)					
PX133	Feb-21			PUCT functional org chart as of February 2021 [attached to 8/6/2021 J. Binford email]					
PX134	Feb-21		Magness Expert 7	PUCT Rule 25.501 (Feb. 2021).					
PX135	Feb-21		Magness Expert 4	Tex. Utilities Code 39.151 (Feb. 2021)					
PX136	2/2/2021		Payton 8	02 Feb 2021 Physical Daily Gas Delivery Prices for March					

PX137	2/5/2021	Public - Available at https://www.ercot.com/files/docs/2021/02/03/February_5_2021_Nodal_Operating_Guide.pdf		ERCOT Nodal Operating Guide					
PX138	2/7/2021	ERCOT_B003 6344-ERCOT_B003 6346	Ogelman 20	Email(s) re: Board inquiry					
PX139	2/10/2021	PUCT 0000352		Email from Shawn Hazard, Emergency Management Coordinator, PUCT to Kasey Feldman et al (Feb. 10, 2021 09:58 CST) (PUCT 0000352)					
PX140	2/10/2021	ERCOT_B003 6466-ERCOT_B003 6437	Rickerson 2	Email(s) re: Vistra call on conditions next week					
PX141	2/11/2021			ACES Audio File (02_11_2021_10_19_Rodney Kuhl)					
PX142	2/12/2021			ACES Audio File (02_12_2021_09_50_Christian Nagel)					
PX143	2/12/2021			ACES Audio File (02_12_2021_09_50_Rob Vrabel)					
PX144	2/12/2021			ACES Audio File (02_12_2021_09_50_Rodney Kuhl)					
PX145	2/12/2021	PUCT 0203666		Texas Declaration of State of Disaster Pursuant to Section 418.014, dated February 12, 2021					
PX146	2/13/2021	ERCOT_B001 0410		Email(s) re: High Price Tracking					

PX147	2/13/2021	Public - https://www.ercot.com/services/comm/mkt_notices/detail?id=1abd107a-59ef-3602-8fb8-369f44aa9b53		ERCOT Notice M-A021321-01 Notice of Railroad Commission of Texas Action on Operation of Gas Utility Systems, Operations, February 13, 2021 09:53AM					
PX148	2/13/2021	ERCOT_B0135769		Magness Email to PUCT					
PX149	2/14/2021	Public - https://www.energy.gov/sites/prod/files/2021/02/f82/DOE%20202%28c%29%20Emergency%20Order%20-%20ERCOT%2002.14.2021.pdf		DOE Order 202-21-1					
PX150	2/14/2021	ERCOT_B0136156- ERCOT_B0136159	Maggio 102	Email(s) re: Pricing info for media call					
PX151	2/14/2021	ERCOT_B0010629		ERCOT letter to DOE					
PX152	2/14/2021	Public - https://www.ercot.com/news/release?id=e2b19f22-7283-3fe8-bed2-a4a979dce772		ERCOT News Release, "Grid operator requests energy conservation for system reliability", February 14, 2021					

PX153	2/14/2021	Public - https://www.ercot.com/services/comm/mkt_notices/detail?id=4b1be90c-b1be-3c81-8c27-1ce90982caea		M-A021421-01 Notice of U.S. Department of Energy Section 202(c) Order affecting the ERCOT Region					
PX154	2/14/2021	Public - https://www.whitehouse.gov/briefing-room/statements-releases/2021/02/14/president-joseph-r-biden-jr-approves-texas-emergency-declaration/		Texas Emergency Declaration Approval, dated February 14, 2021					
PX155	2/15/2021		Walker 115	Audio Transcription of Emergency Open Meeting, Monday, February 15, 2021					
PX156	2/15/2021	PUCT_0020865- PUCT_0020868	Walker 113	Email(s) re: 51617 Winter ERCOT Order					
PX157	2/15/2021	ERCOT_B0010828- ERCOT_B0010836	Ögelman 8/ Maggio 112	Email(s) re: Commission Order on Reliability Deployment Pricing Run and Peaker Net Margin Threshold					
PX158	2/15/2021	ERCOT_B0136379- ERCOT_B0136381	Maggio 109	Email(s) re: Draft Order Directing Certain Actions					

PX159	2/15/2021	ERCOT_B003 7837- ERCOT_B003 7838	Ögelman 112	Email(s) re: Pricing during EEA					
PX160	2/15/2021	ERCOT_B013 6397 - ERCOT_B013 6399	Maggio 108/ Ögelman 7	Email(s) re: Proposed language					
PX161	2/15/2021	Public - https://www.ercot.com/services/comm/mkt_notices/detail?id=bbd04677-bc71-3a8f-9d99-5715e3484f5e		ERCOT Notice M-C021521-01 Legal - Public Utility Commission Emergency Orders Affecting ERCOT Market Prices - February 15 2021 11:08 PM					
PX162	2/15/2021	Public - https://www.ercot.com/services/comm/mkt_notices/detail?id=d0249671-372b-3690-b45e-f1783f47d642		ERCOT Notice M-C021521-02 Update: Public Utility Commission Emergency Orders Affecting ERCOT Market Prices - February 16, 2021 6:04 PM					
PX163	2/15/2021	Public - https://www.ercot.com/services/comm/mkt_notices/detail?id=9e59e0d5-abb0-3f8d-aa5a-2e1d358a362f		ERCOT Notice M-C021521-03 Update: Public Utility Commission Emergency Orders Affecting ERCOT Market Prices - February 17, 2021 09:24PM					
PX164	2/15/2021	ERCOT_B004	Maggio	Meeting Invite, Commission Order on					

		6358	111	Reliability Deployment Pricing Run, etc.					
PX165	2/15/2021	Public - available at https://interchange.puc.texas.gov/Documents/51617_3_1111656.PDF	Magness 103/ Ögelman 105/ Maggio 110/ Ruane 8/ Graves 4/ Magness Expert 8/ Walker 109/ Payton 9/ Sotkiewicz 32/ D'Andrea 4	Order Directing ERCOT to Take Action and Granting Exception to Commission Rules, PUC Project No. 51617, February 15, 2021					
PX166	2/15/2021	PUCT_0099196- PUCT_0099197	Walker 114	PUC Open Meeting Agenda, Monday, February 15, 2021, 5:20 P.M.					
PX167	2/16/2021		Walker 118	Audio Transcription of Emergency Open Meeting, Monday, February 16, 2021					
PX168	2/16/2021	Public - https://nymag.com/intelligencer/2021/02/extreme-winter-weather-wreaks-havoc-across-u-s.html		Danner, Chas (February 16, 2021). Extreme Winter Weather Wreaks Havoc Across U.S. New York Intelligencer					
PX169	2/16/2021	ERCOT_B0271701-10		Email chain re: Load shed changes - GMS contact for tonight 2/15/2022 [sic]					
PX170	2/16/2021	ERCOT_B0038405-	Magness 102	Email(s) re: February 16 ERCOT Update					

		ERCOT_B003 8411							
PX171	2/16/2021	PUCT_000539 0 – PUCT_000539 1	Ögelman 12	Email(s) re: Houston Chronicle					
PX172	2/16/2021	ERCOT_B003 8283– ERCOT_B003 8288	Maggio 114	Email(s) re: Load shed changes – GMS contact for tonight					
PX173	2/16/2021	ERCOT_B003 8238– ERCOT_B003 8242	Ögelman 9	Email(s) re: Load Shed changes – GMS contact for tonight 2/15/2022					
PX174	2/16/2021	PUCT_002530 6- PUCT_002530 9	Walker 117	Email(s) re: open meeting today					
PX175				EXHIBIT INTENTIONALLY OMITTED					
PX176	2/16/2021	ERCOT_B003 8414	Magness 26	Magness email RE: February 16 ERCOT update					
PX177	2/16/2021	produced during discovery as PUCT 0206028 and ERCOT_B014 3933	Bivens 7/ D'Andrea 11/ Magness 60/ Magness Expert 9/ Ögelman 106/ Walker 116/ Graves 5/ Sotkiewicz 33	Second Order Directing ERCOT to Take Action and Granting Exception to Commission Rules, PUC Project No. 51617, February 16, 2021					

PX178	2/17/2021			Brazos Electric's Daily Cash Status Report as of February 17, 2021					
PX179	2/17/2021	ERCOT_B001 0979– ERCOT_B001 0987	Maggio 117/ Ögelman 11	Email(s) re: Commission Order on Reliability Deployment Pricing Run and Peaker Net Margin Threshold					
PX180	2/17/2021	ERCOT_B017 6363– ERCOT_B017 6326	Maggio 135	Email(s) re: GTBD adjustment for pricing run as we exit EEA3					
PX181	2/17/2021	ERCOT_B001 0924 – ERCOT_B001 0961	Magness 29	Email(s) re: Need better weatherization talking points					
PX182	2/17/2021	PUCT_000616 1	Ögelman 14	Email(s) re: Price of electricity					
PX183	2/18/2021	PUCT_001502 3- PUCT_001502 5	Walker 124	Email re ERCOT Notice re: M-C021521-04 Update: ERCOT Expectations Regarding Exiting EEA3 and Public Utility Commission Emergency Orders Affecting ERCOT Market Prices					
PX184	2/18/2021	ERCOT_B000 9220	Ögelman 29/ Ögelman 114	Email(s) from Carrie Bivens re: pricing concerns					
PX185	2/18/2021	ERCOT_B000 9194- ERCOT_B000 9195	Woodfin 13	Email(s) re: draft market notice eea3					
PX186	2/18/2021	ERCOT_B000 9197- ERCOT_B000 9198	Woodfin 14	Email(s) re: Edited draft market notice					
PX187	2/18/2021	ERCOT_B000 1643	Maggio 119	Email(s) re: ERCOT Morning Brief					

PX188	2/18/2021	ERCOT_B027 2138– ERCOT_B027 2140	Parakkuth 8	Email(s) re: M-C021521-04 Update: ERCOT Expectations Regarding Exiting EEA3 and Public Utility Commission Emergency Orders Affecting ERCOT Market Prices					
PX189	2/18/2021	ERCOT_B000 1415	Woodfin 12	Email(s) re: Woodfin notes Feb. 18					
PX190	2/18/2021	ERCOT_B027 1981	Graves 24/ Bivens 11/ Maggio 121/ Magness Expert 13	ERCOT Notice M-C021521-04 Update: ERCOT Expectations Regarding Exiting EEA3 and Public Utility Commission Emergency Orders Affecting ERCOT Market Prices - February 18, 2021 07:46AM					
PX191				EXHIBIT INTENTIONALLY OMITTED					
PX192	2/19/2021	ERCOT_B013 8754- ERCOT_B013 8757	Rickerson 17	Email(s) re: Morning Update					
PX193	2/19/2021	ERCOT_B013 9773– ERCOT_B013 9774	Ögelman 36/ Magness 57	Email(s) re: WSJ Story – alerting you/seeking feedback					
PX194	2/19/2021	Public - https://www.ercot.com/news/release?id=ee7cd076-09b9-39da-a9ba-4287028dc3eb		ERCOT News Release, dated February 19, 2021					
PX195	2/19/2021	Public - https://www.ercot.com/service/comm/mkt_notices/detail?id		ERCOT Notice M-C021521-05 Update: ERCOT Expectations Regarding Exiting EEA3 and Public Utility Commission Emergency Orders Affecting ERCOT Market Prices, February 19, 2021 09:27AM					

		=dba778b5-e00b-30c6-ba2c-16784af65c2d							
PX196	2/19/2021	Public - https://www.ercot.com/services/comm/mkt_notices/detail?id=feefdd8f-8530-3e80-bf31-34169c46deb9		M-A021921-01 Exceptional Fuel Costs submitted for multiple Resources between February 12 and 16, 2021					
PX197				EXHIBIT INTENTIONALLY OMITTED					
PX198	2/21/2021	Public - https://www.puc.texas.gov/consumer/facts/factsheets/electricfacts/WinterStormPriceExplainer-FIN.pdf	Ögelman 16	“Electricity Prices during the 2021 Winter Storm” Prepared by the Public Utility Commission of Texas					
PX199	2/22/2021	ERCOT_B0016394		Attachment to email re Lt. Governor question					
PX200	2/22/2021	Public - https://www.ercot.com/services/comm/mkt_notices/detail?id=ae3e1251-4d26-3fab-a5f8-		M-A022221-01 ERCOT is temporarily deviating from Protocol deadlines and timing related to settlements, collateral obligations, and Invoice payments					

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PX201	2/23/2021	ERCOT_B027 2370	Bivens 15	Email from Carrie Bivens attaching IMM Presentation to ERCOT Board (2/24/21)					
PX202	2/23/2021	ERCOT_B027 2419- ERCOT_B027 2429	Rickerson 13 / Magness 36	Email(s) re: Things we haven't done – followup to 2011 Cold Weather Report					
PX203	2/24/2021	Public - https://www.ercot.com/files/docs/2021/02/24/2.3_Market_Financial_Matters.pdf		ERCOT Board Presentation by IMM (Potomac)					
PX204	2/24/2021	Public - https://www.ercot.com/files/docs/2021/02/24/2.2_REVISIED_ERCOT_Presentation.pdf		Review of February 2021 Extreme Cold Weather Event – ERCOT Presentation, dated February 24, 2021					
PX205	2/25/2021	PUCT_003874 2	Magness 38	Email(s) re: ERCOT Board of Directors 02-24- 21					
PX206	2/25/2021	ERCOT_B005 6066- ERCOT_B005 6220	Walker 1	Joint Hearing Transcript: State Affairs & Energy Resources, Testimony of ERCOT CEO Bill Magness and PUC Chairman DeAnn Walker					
PX207	2/25/2021	ERCOT_B030 3152	Sotkiewicz 38	Magness PPT - Review of Feb 21 Extreme Cold Event (02.25.21)					

PX208	2/25/2021	ERCOT_B002 4819 and public - https://www.ercot.com/files/docs/2021/03/03/Texas_Legislature_Hearings_2-25-2021.pdf		Review of February 2021 Extreme Cold Weather Event – ERCOT Presentation, dated February 25, 2021					
PX209	2/25/2021	ERCOT_B005 2964- ERCOT_B005 3066	Walker 128	Transcription of Video Recording of Hearing of Senate Committee on Business & Commerce Testimony of Bill Magness and DeAnn Walker					
PX210	2/26/2021	ERCOT_B014 1472	Magness 40	Proposed Email to Dan Patrick					
PX211	3/1/2021			Debtor's Emergency Motion For Entry Of An Order Authorizing Continued Use Of Cash Management System, Bank Accounts, Business Forms And Company Credit Cards And Related Relief (Docket No. 26)					
PX212	3/1/2021			Declaration Of Clifton Karnei In Support Of Chapter 11 Petition And Emergency First-Day Motions (Docket No. 3)					
PX213	3/1/2021	PUCT_002076 7- PUCT_002080 0	Walker 110	Letter for DeAnn Walker to Chairman of Senate Business and Commerce Committee, House State Affairs Committee, and House Energy Resources Committee					
PX214	3/1/2021	PUCT_002247 5- PUCT_002247 6	Walker 101	Letter from Governor Greg Abbott to Chairman DeAnn Walker accepting her resignation					
PX215	3/2/2021	ERCOT_B002 0811 – ERCOT_B002 0827	Maggio 127	Email(s) re: Potential price correction for weather event					

PX216	3/3/2021	Public - https://www.austintexas.gov/edims/document.cfm?id=355922		Austin Energy Feb Storm Briefing					
PX217	3/3/2021	ERCOT_B002 4429– ERCOT_B002 4433	Maggio 128	Email(s) re: Potential price correction for weather event					
PX218	3/4/2021		Ögelman 21	03/04/2021 Senate Committee on Business & Commerce Transcript					
PX219	3/4/2021	ERCOT_B004 5543		ERCOT's Letter Re: Generator Outages During February 2021 Cold Weather Event, dated March 4, 2021					
PX220	3/4/2021	Public - https://interchange.puc.texas.gov/Documents/51812_61_1114183.PDF	Bivens 106/ Magness 107/ Ögelman 115/ Maggio 124	Potomac Letter (3/4/21) re: PUC Project No. 51812, Issues Related to the State of Disaster for the February 2021 Winter Weather Event					
PX221	3/4/2021	ERCOT_B005 7146	D'Andrea 102	Transcript of D'Andrea Testimony at March 4, 2021 Hearing of the House State Affairs Committee					
PX222	3/9/2021	ERCOT_B004 5740– ERCOT_B004 5745	Magness 108	Email(s) re: Draft Letter to PUC					
PX223	3/10/2021	ERCOT_B003 0899 – ERCOT_B003 0901	Magness 3	Email(s) re: IMM Letter with energy price recommendation (3/4/21)					
PX224	3/11/2021	ERCOT_B005 4220–	Magness 105	03/11/2021 Senate Committee on Jurisprudence Hearing Transcript					

		ERCOT_B005 4293							
PX225	3/11/2021	ERCOT_B014 4161 – ERCOT_B014 4164	Magness 4	Email(s) re: 03.11.2021 IMM Letter					
PX226	3/11/2021	ERCOT_B014 4068 – ERCOT_B014 4092	Magness 7	Email(s) re: House State Affairs slide deck for tomorrow					
PX227				EXHIBIT INTENTIONALLY OMITTED					
PX228	3/11/2021	Public - https://www.ercot.com/files/docs/2021/03/18/Magness_statement_for_senate_energy_and_natural_resources_committee_final.pdf		ERCOT Magness Statement -Senate Energy Committee Hearing on Resiliency (03.11.21)					
PX229	3/11/2021	Public - https://interchange.puc.texas.gov/Documents/51812_149_1115720.PDF	Bivens 107	Potomac Letter (3/11/21) re: State of Disaster for the February 2021 Winter Weather Event					
PX230	3/11/2021	ERCOT_B005 4387	Bivens 3	Senate Committee Hearing Transcript (Examining Billing Errors)					
PX231	3/11/2021		D'Andrea 26	Transcript of Testimony of Arthur D'Andrea before Senate Committee on Jurisprudence					
PX232	3/15/2021	ERCOT_B014 4508 – ERCOT_B014 4516	Magness 8	Email(s) re: House State Affairs draft slide deck					

PX233	3/16/2021	Public - https://www.texasmonthly.com/news-politics/wall-street-profited-off-texas-blackouts/		“Some on Wall Street Profited off Texas Blackouts. In a Private Call, a Top Regulator Pledged He Would Try to Protect Their Windfall” (Texas Monthly)					
PX234	3/16/2021	ERCOT_B0057606 – ERCOT_B0057626	Magness 106	03/16/2021 Senate Committee on State Affairs Hearing Transcript					
PX235	3/17/2021	Public - https://www.texasattorneygeneral.gov/sites/default/files/opinion-files/opinion/2021/kp-0363.pdf		Opinion No. KP-0363 of the Attorney General of Texas issued on March 17, 2021					
PX236	3/18/2021	Public - https://www.dallasnews.com/news/watchdog/2021/03/18/ousted-public-utility-commission-chairman-admits-he-favors-helping-investors-not-the-public/		David Lieber, Dallas Morning News, Ousted Public Utility Commission chairman admits he favors helping investors, not the public. March 18, 2021					

PX237	3/24/2021	ERCOT_B014 5508 and public - https://docs.house.gov/meetings/IF/IF02/20210324/111365/HHRG-117-IF02-Wstate-MagnessB-20210324.pdf		House Energy and Commerce Committee: Oversight and Investigations - March 24, 2021 Hearing: “Power Struggle: Examining the 2021 Texas Grid Failure” Statement by Bill Magness, President and Chief Executive Officer, ERCOT					
PX238	3/24/2021	ERCOT_B014 5511		Truth in Testimony Disclosure Form - House Energy and Commerce Committee: Oversight and Investigations, date 03/24/21 - Witness: Bill Magness					
PX239	3/25/2021	Public - https://www.ercot.com/news/release?id=3b6e4da3-fcbf-3c50-96b7-68c661568f13		ERCOT Press Release - ERCOT studies range of scenarios prior to summer, identifies low risk for outages					
PX240	3/25/2021	Public - https://www.ercot.com/files/docs/2021/03/25/SARA-PreliminarySummer2021.pdf		Preliminary Seasonal Assessment of Resource Adequacy for the ERCOT Region (SARA) Summer 2021					
PX241	3/29/2021	Public - https://uh.edu/news-events/stories/2021/march-2021/03292021-hobby-winter-		Stipes, Chris. University of Houston, “New Report Details Impact of Winter Storm Uri on Texans”, March 29, 2021					

		storm.php							
PX242	3/30/2021			Luminant PUCT Rule 11 Agreement					
PX243	3/31/2021			Navarro County Electric Cooperative, Inc. - RUS Form 7 as of December 31, 2020					
PX244	Apr-21	Public - https://docs.txoga.org/files/2644-4-22-21-enverus_txoga_winter-storm-uri-natural-gas-analysis.pdf		Enverus, Winter Storm Uri – Natural Gas Analysis, April 2021					
PX245	4/6/2021	Public - http://interchange.puc.texas.gov/Documents/51878_20_1120255.PDF	Rickerson 104	February 2021 Extreme Cold Weather Event: Preliminary Report on Causes of Generator Outages and Derates, April 6, 2021. PUC Project No. 51878, Item 20					
PX246	4/13/2021		Magness 55	04/13/2021 ERCOT Board Meeting Item No. 9					
PX247	4/15/2021			Methodology for Implementing Operating Reserve Demand Curve (ORDC) to Calculate Real-Time Reserve Price Adder, Version 2.7					
PX248	4/16/2021		Ögelman 26	ERCOT Winter Storm Review of Demand-Side Resources and Other Related Topics					
PX249	4/27/2021	Public - https://www.ercot.com/files/docs/2021/04/28/ERCOT_Winter_Storm_Generator_Outages_By_Cause_Updated.pdf		Update to April 6, 2021 Preliminary Report on Causes of Generator Outages and Derates During the February 2021 Extreme Cold Weather Event					

		ated_Report_4.27.21.pdf							
PX250	4/30/2021		Magness 2	04/30/2021 Magness Letter to Pallone					
PX251	May-21	Public - https://www.potomaceconomics.com/wp-content/uploads/2021/06/2020-ERCOT-State-of-the-Market-Report.pdf		2020 State of the Market Report for the ERCOT Electricity Markets, Potomac Economics, May 2021					
PX252	May-21	Public - https://www.ercot.com/files/docs/2021/06/11/2021_EEA_Overview_Final.pdf	Graves 17	ERCOT 2021 Energy Emergency Alert Overview, May 2021					
PX253	5/4/2021	ERCOT_B004 6655	Jones 102	Transcript of Testimony of Brad Jones and Lori Cobos before Senate Committee					
PX254	5/4/2021	ERCOT_B004 6645– ERCOT_B004 6654	Ögelman 107	Transcript of Texas Senate Business & Commerce Committee Meeting, Testimony of Brad Jones and Lori Cobos					
PX255	5/6/2021	Public - https://www.ercot.com/files/docs/2021/05/06/Media_Call_EEA_Deck_for_May_6_2021		ERCOT Overview & Emergency Procedures dated May 6 2021					

		FINAL.pdf							
PX256	5/7/2021	Public - https://www.eia.gov/todayinenergy/detail.php?id=47876#:~:text=Residential%20bills%20increased%20by%20a,commercial%20sales%20were%206%25%20lower.		Average Texas electricity prices were higher in February 2021 - EIA					
PX257	5/14/2021	Public - https://www.expressnews.com/business/article/ERCOT-CEO-winter-storm-pricing-16178206.php		A deviation from ERCOT's rules: Interim CEO's comments raise questions about power pricing during storm - San Antonio Express News					
PX258	5/21/2021			Superpriority Secured Debtor-In-Possession Credit Agreement between Brazos and JPMorgan Chase Bank, N.A., executed on May 21, 2021 (Dkt. 733-4)					
PX259	5/28/2021			London Economics International, LLC (2021). Analysis of ERCOT market prices during February 2021 winter storm event. Prepared for Vistra Corp. May 28, 2021					
PX260	6/1/2021		Ögelman 37/Maggio 130	Enoch Kever letter attaching LEI report					

PX261	6/3/2021		Bivens 109/ Maggio 139	NPRR 1081, Revisions to Real-Time Reliability Deployment Price Adder to Consider Firm Load					
PX262	6/14/2021		Jones 105/ Ögelman 109/ Ruane 7	ERCOT Proof of Claim, with exhibits [Claim No. 115]					
PX263	6/24/2021	Public - https://www.sanantonio.gov/Portals/5/files/CEP%20Report%20Final.pdf		City of San Antonio CEP Report Final					
PX264	6/28/2021			NPRR1081 - Revisions to Real-Time Reliability Deployment Price Adder to Consider Firm Load Shed, ERCOT Board Report, June 28, 2021					
PX265	7/12/2021	Public - https://www.puc.texas.gov/agency/resources/reports/UTAustin_(2021)_EventsFebruary2021TexasBlackout_(002)FINAL_07_12_21.pdf		University of Austin at Texas, Energy Institute, The Timeline and Events of the February 2021 Texas Electric Grid Blackouts					
PX266	8/2/2021			ERCOT's Response to NRG Energy, Inc.'s First Request for Information, PUCT Docket No. 52322, August 2, 2021					
PX267	8/18/2021			Debtor's Complaint Objecting To Electric Reliability Council Of Texas, Inc.'s Proof Of Claim And Other Relief (Adversary Proceeding Docket No. 1)					

PX268	9/2/2021		Jones 108	Brief for Appellee Luminant Energy filed in Texas Third Court of Appeals, Case No. 03-21-00098-CV					
PX269	9/2/2021		Ögelman 111	Case No. 03-21-00098-CV, Third Court of Appeals, Brief for Appellee					
PX270	9/23/2021		Graves 8	Project No. 52631 PUCT Request for Comments on the High System-Wide Offer Cap					
PX271	9/28/2021	ERCOT_B015 1460		Capacity Demand and Reserves Report (Dec. 2020) (excel)					
PX272	9/29/2021	ERCOT_B013 2965	Maggio 138A	SECD_Rerun_Summary_0215_0217.csv (excel)					
PX273	9/29/2021	ERCOT_B013 2967	Maggio 137A	SECD_Rerun_Summary_0218_0219.csv (excel)					
PX274	10/22/2021		Ögelman 103	ERCOT's Objections and Responses to Brazos Electric's First Set of Interrogatories, First Requests for Admission, and Third Set of Requests for Production					
PX275	10/25/2021			Amended Complaint [Adv. Dkt. No. 173]					
PX276	10/27/2021	Public - https://www.austintexas.gov/sites/default/files/files/HSEM/Winter-Storm-Uri-AAR-and-Improvement-Plan-Technical-Report.pdf		Winter Storm Uri AAR and Improvement Plan Technical Report					
PX277	Nov-21	Public - https://www.ercot.com/files/docs/2021/11/23/ERCOT%20Fact%20Sheet.pdf		ERCOT Fact Sheet					

		df							
PX278	11/1/2021	Public - https://www.spglobal.com/ratings/en/research/articles/211101-texas-winter-storm-brought-downgrades-and-spurred-response-among-public-power-and-electric-cooperative-utility-12164982		Texas Winter Storm Brought Downgrade _ S&P Global Ratings					
PX279	11/3/2021			Answer to Amended Complaint [Adv. Dkt. No. 192]					
PX280	11/4/2021		Jones 111/ Ruane 6	ERCOT Amended Proof of Claim, with exhibits [Claim No. 115-2]					
PX281	11/11/2021			Email chain re: Deposition scheduling, top string 8:59 pm ET email from E. Clark to S. Schinfeld to, attaching mark-up of draft stipulation re: Brad Jones					
PX282	11/12/2021			Email chain re: Deposition scheduling, top string 1:32 pm ET email from S. Schinfeld to E. Clark					
PX283	11/16/2021			NERC Final Report on February 2021 Freeze Underscores Winterization Recommendations					
PX284	11/23/2021			ERCOT Supplemental Objections and Responses to 1st Set of Interrogatories, 1st Requests for Admission, and 3rd Sets of RFPs to ERCOT					

PX285	12/2/2021	Public - https://interchange.puc.texas.gov/Documents/52631_47_1171647.PDF	Graves 9	Project No. 52631 Proposal for Adoption for Amendments to 16 TAC Sec. 25.505 as Approved at the December 2, 2021 Open Meeting					
PX286	12/7/2021	Public - https://www.ercot.com/services/comm/mkt_notices/detail?id=397d6d0b-27bf-4db1-8ede-1c8627f1042f		December 7, 2021 ERCOT Market Notice, Implementation of the Public Utility Commission of Texas's (PUC's) approval of changes to the High System-Wide Offer Cap (HCAP)					
PX287	12/8/2021			Public Utility Regulatory Act, Section 39.151 Essential Organizations					
PX288	12/8/2021	Public - https://quantumspectrum.net/texas-electricity-deregulation/		Quantum Spectrum Energy - Deregulation of the Texas Electricity Market					
PX289	12/9/2021			Christopher J. Kearns CV					
PX290	12/9/2021			Kearns - Brazos Electric Ability to Pay					
PX291	12/9/2021			Kearns - Documents Relied Upon					
PX292	12/9/2021			Kearns - ERCOT Settlement Invoices					
PX293	12/9/2021			Kearns - Member Ability to Pay					
PX294	12/16/2021	Public - https://www.adminmonitor.com/tx/puct/open_meeting/20211216/2/		Transcription of Recording of December 16, 2021, PUCT Open Meeting, Part 2					

PX295	12/17/2021	Public - https://www.ercot.com/files/docs/2021/12/16/ERCOT_Cold_Weather_Presentation.pptx		NERC Presentation to ERCOT - The February 2021 Cold Weather Outages in Texas and the South Central United States – Gas and Electric Interdependencies					
PX296	12/21/2021			Errata sheet for DeAnn Walker Deposition Transcript					
PX297	12/22/2021	public - https://www.puc.texas.gov/agency/rulesnlaws/subrules/electric/25.505/25.505.pdf	Graves 10	PUCT Rule 25.505					
PX298	1/3/2022			Miller Inventories 02192021 0307hs					
PX299	1/3/2022			NGPL TX-OK SNL Prices					
PX300	1/7/2022			Joint Stipulation to Calculations and Expert Testimony At Trial [Adv. Dkt. No. 291]					
PX301	02/18-19/2021		Sotkiewicz 49	RTM_ORDC_REL_DPLY_PRC_ADDR_RSR V_2021 (excerpt)					
PX302		Public - https://austinenenergy.com/wcm/connect/482f26ba-7c94-465a-8a00-59bd65f33967/Feb2021-WinterStormsAfterActionReport.pdf?MOD=AJPERES&CVI D=nS28hAN		Austin Energy Winter Storms After Action Report					
PX303			Graves 7	2021 Brattle Market Design Options for					

				Managing Reliability in ERCOT					
PX304		Public - https://www.ferc.gov/media/february-2021-cold-weather-outages-texas-and-south-central-united-states-ferc-nerc-and		FERC - NERC - Regional Entity Staff Report: The February 2021 Cold Weather Outages in Texas and the South Central United States					
PX305	Various	BRAZOS_000008693		All interim and final ERCOT settlement invoices to Brazos for February 2021 power purchases					
PX306		Public - https://www.austintexas.gov/sites/default/files/files/HSEM/2021-Winter-Storm-Uri-AAR-Findings-Report.pdf		City of Austin and Travis County 2021 Winter Storm Uri AAR Findings Report					
PX307				CDR Winter 2020- 21 Peak Ave Wind And Solar Capacity Percentages (excel)					
PX308		Public - https://www.cpsenergy.com/content/dam/corporate/en/Documents/CPS%20Energy%20and%20the%20Texas%20Electric%20Market%200-		CPS Energy and the Texas Electric Market - March 2021 - Final Version					

		%20March%202021%20-%20Final%20Version.pdf							
PX309		Public - https://www.eia.gov/electricity/monthly/epm_table_grapher.php?t=epmt_6_07_a		Electric Power Monthly - U.S. Energy Information Administration (EIA)					
PX310				EOP-011-1 Emergency Operations					
PX311		Public - https://www.ercot.com/news/mediakit/maps		ERCOT Maps					
PX312		Public - https://www.ercot.com/files/docs/2020/05/12/2019_09_Set301_M6_RT.pdf		ERCOT Market Education, Settlements 301, Module 6: Real-Time Operations					
PX313		Public - http://mis.ercot.com/misapp/GetReports.do?reportTypeId=13231		ERCOT Report on Historical Real-Time ORDC and Reliability Deployment Price Adders and Reserves for February 2021 (excel)					
PX314		Public - http://www.ercot.com/mktinfo/rtn		ERCOT's Real-Time Market Website (Data Source From)					

PX315				EXHIBIT INTENTIONALLY OMITTED					
PX316				Log of ERCOT directed orders to transmission operators prepared by Brazos Electric					
PX317				Chart of Lowest Temperature Days from 2011-2021					
PX318		Public - https://www.weather.gov/wrh/climate		National Weather Service Regions					
PX319				RTM_ORDC_REL_DPLY_PRC_ADDR_RSRV_2021.xlsx (excel)					
PX320		Public - http://www.puc.texas.gov/winterstorm21/		Screenshot of puc.texas.gov-winterstorm21					
PX321		ERCOT_B0269147	Magness 15	Magness texts to Theresa Gage between 2/8/21 and 3/8/21	C				
PX322	2/16/2021	PUCT 0214312		W. Roth email re involuntary load shed not out of market reliability deployment	Redacted and de-designated				
PX323	2/17/2021	PUCT 0214321		A. Barlow email re mistake putting out press release	Redacted and de-designated				
PX324	2/19/2021	PUCT 0214240		V. Leady email re: ERCOT data brief	Redacted and de-designated				

PX325	2/20/2021	PUCT 0214394		C. Corona email re notes on D'Andrea and Walker conversations	Redacted and de-designated				
PX326	1/5/2021 - 3/30/2021	PUCT 0214478		Text messages between T.J. Gleeson and Connie Corona between 1/5/21 and 3/30/21	Redacted and de-designated				
PX327	11/5/2020	ERCOT_B0063041		Final Seasonal Assessment of Resource Adequacy for the ERCOT Region (SARA) Winter 2020/2021 (Excel native)	HC				
PX328	2/22/2021	ERCOT_B0185073		M-A022221-01 ERCOT is temporarily deviating from Protocol deadlines and timing related to settlements, collateral obligations, and Invoice payments	HC				
PX329	4/6/2021	ERCOT_B0067150		February 2021 Extreme Cold Weather Event: Preliminary Report on Causes of Generator Outages and Derates, April 6, 2021. PUC Project No. 51878, Item 20	HC				
PX330	11/5/2020	ERCOT_B0151474		Final Seasonal Assessment of Resource Adequacy for the ERCOT Region (SARA) Winter 2020/2021					
PX331	2/1/2021	ERCOT_B0130308		ERCOT Nodal Protocols as of February 1, 2021					
PX332	2/5/2021	ERCOT_B0132529		ERCOT Nodal Operating Guide					
PX333	2/13/2021	ERCOT_B0048883		ERCOT Notice M-A021321-01 Notice of Railroad Commission of Texas Action on Operation of Gas Utility Systems, Operations, February 13, 2021 09:53AM					
PX334	2/14/2021	ERCOT_B0012138		M-A021421-01 Notice of U.S. Department of Energy Section 202(c) Order affecting the ERCOT Region					

PX335	2/14/2021	ERCOT_B001 2142		DOE Order 202-21-1					
PX336	2/14/2021	ERCOT_B013 2914		ERCOT News Release, "Grid operator requests energy conservation for system reliability", February 14, 2021					
PX337	2/15/2021	ERCOT_B004 6683		ERCOT Notice M-C021521-01 Legal - Public Utility Commission Emergency Orders Affecting ERCOT Market Prices - February 15 2021 11:08 PM					
PX338	2/15/2021	ERCOT_B004 6684		ERCOT Notice M-C021521-03 Update: Public Utility Commission Emergency Orders Affecting ERCOT Market Prices - February 17, 2021 09:24PM					
PX339	2/15/2021	ERCOT_B004 8888		ERCOT Notice M-C021521-02 Update: Public Utility Commission Emergency Orders Affecting ERCOT Market Prices - February 16, 2021 6:04 PM					
PX340	2/15/2021	ERCOT_B013 6587		Order Directing ERCOT to Take Action and Granting Exception to Commission Rules, PUC Project No. 51617, February 15, 2021					
PX341	2/16/2021	ERCOT_B013 2943		Second Order Directing ERCOT to Take Action and Granting Exception to Commission Rules, PUC Project No. 51617, February 16, 2021					
PX342	2/19/2021	ERCOT_B004 6686		ERCOT Notice M-C021521-05 Update: ERCOT Expectations Regarding Exiting EEA3 and Public Utility Commission Emergency Orders Affecting ERCOT Market Prices, February 19, 2021 09:27AM					
PX343	2/19/2021	ERCOT_B013 2910		ERCOT News Release, dated February 19, 2021					
PX344	2/19/2021	PUCT 0021680		M-A021921-01 Exceptional Fuel Costs submitted for multiple Resources between February 12 and 16, 2021					

PX345	2/21/2021	PUCT 0018443		"Electricity Prices during the 2021 Winter Storm" Prepared by the Public Utility Commission of Texas					
PX346				EXHIBIT INTENTIONALLY OMITTED					
PX347	2/24/2021	ERCOT_B030 3463		Review of February 2021 Extreme Cold Weather Event – ERCOT Presentation, dated February 24, 2021					
PX348	3/4/2021	ERCOT_B005 3834		03/04/2021 Senate Committee on Business & Commerce Transcript					
PX349	3/4/2021	PUCT 0108656		Potomac Letter (3/4/21) re: PUC Project No. 51812, Issues Related to the State of Disaster for the February 2021 Winter Weather Event					
PX350				EXHIBIT INTENTIONALLY OMITTED					
PX351	3/11/2021	ERCOT_B014 3706		ERCOT Magness Statement - Senate Energy Committee Hearing on Resiliency (03.11.21)					
PX352	3/17/2021	PUCT 0055329		Opinion No. KP-0363 of the Attorney General of Texas issued on March 17, 2021					
PX353	4/27/2021	ERCOT_B013 0283		Update to April 6, 2021 Preliminary Report on Causes of Generator Outages and Derates During the February 2021 Extreme Cold Weather Event					
PX354	2/15/2021	ERCOT_B013 6379	Maggio 109	Email from L. Hughes to C. Corona, T. Gleeson, and R. Zerwas attaching Draft Order Directing Certain Actions nb.docx					
PX355	2/18/2021	ERCOT_B000 1643	Maggio 119	Email from D. Maggio to R. Zerwas, et al. re: ERCOT Morning Brief					
PX356	2/25/2021			Transcript of video recording of state affairs and energy resources committees joint hearing - testimony of ERCOT CEO Bill Magness and PUCT Chairman DeAnn Walker					

PX357	2/25/2021			Transcript of video recording of senate committee on business and commerce - excerpt of testimony of Bill Magness and DeAnn Walker					
PX358	3/11/2021			Transcription of video recording of senate committee on jurisprudence hearing to examine billing errors resulting from Winter Storm Uri and explore the means available for correcting those errors					
PX359	3/16/2021			Transcription of video recording of committee on state affairs excerpt of testimony of Bill Magness					
PX360	2/19/2021	Public - https://www.ercot.com/services/comm/mkt_notices/detail?id=a426f7c4-6d2a-3b1e-bf36-9c07d261e260		ERCOT Market Notice M-B021921-01 Collateral Adjustments and Invoice Payments					
PX361	2/19/2021	Public - https://www.ercot.com/services/comm/mkt_notices/detail?id=fcdcd10f6-3fe4-3ee2-9758-9895f042df39		ERCOT Market Notice W-A021921-01 Short payment for failure to make Invoice payment by Market Participants					
PX362	2/22/2021	Public - https://www.ercot.com/services/comm/mkt_notices/detail?id=ae3e1251-		ERCOT Market Notice M-A022221-01 ERCOT is temporarily deviating from Protocol deadlines and timing related to settlements, collateral obligations, and Invoice payments					

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PX363	2/23/2021	Public - https://www.ercot.com/services/comm/mkt_notices/detail?id=baf74cf0-4744-3f90-ac30-068305da34e5		ERCOT Market Notice M-A022221-02 ERCOT has ended its temporary deviation from Protocol deadlines and timing related to settlements, collateral obligations, and invoice payments					
PX364	2/23/2021	Public - https://www.ercot.com/services/comm/mkt_notices/detail?id=036d6472-c93b-33cf-9d24-922f2206ae62		ERCOT Market Notice M-A022321-01 ERCOT Discretion to Resolve Financial Obligations					
				Any document or pleading filed in the above-captioned adversary proceeding or main case					
				Any exhibit necessary for impeachment and/or rebuttal purposes					
				Any exhibit identified or offered by any other party					